REMARKS

Applicant respectfully requests reconsideration of this application in view of the following remarks. For the Examiner's convenience and reference, Applicant's remarks are presented in substantially the same order in which the corresponding issues were raised in the Office Action.

Status of the Claims

Claims 1-31 are pending. Claim 25 is currently amended. No claims are canceled. No claims are added. No new matter has been added.

Summary of the Office Action

Claims 4, 19, 24, and 29-31 stand objected to as depending from a rejected independent claim, but would be allowable if rewritten in independent form to include all intervening claim limitations.

Claims 1-3, 5-12, 15-18, 20-23, and 25-28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application No. 6,990,448 to Charlesworth et al. (hereinafter "Charlesworth") in view of U.S. Patent Application No. 6,917,912 to Chang et al. (hereinafter "Chang").

Claim 13 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Charlesworth in view of Chang, and further in view of U.S. Patent Application No. 6,665,644 to Kanevsky et al. (hereinafter "Kanevsky").

Claim 14 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Charlesworth in view of Chang, and further in view of Lucas (VoiceXML for Web-based distributed conversational applications).

Response to Rejections under 35 U.S.C. § 103(a)

The Office Action rejected claims 1-3, 5-12, 15-18, 20-23, and 25-28 under 35 U.S.C. § 103(a) as being unpatentable Charlesworth in view of Chang. Applicant respectfully requests withdrawal of these rejections because the combination of cited references fails to teach or suggest all of the limitations of the claims.

CLAIMS 1-22 and 25-31

Claim 1 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Charlesworth in view of Chang. Applicant respectfully submits that claim 1 is patentable over the combination of cited references because the combination does not teach or suggest all of the limitations of the claim. Claim 1 recites:

> A method, comprising:
>
> identifying attributes including one or more types of accents and one or more types of human languages from a multi-party audio information stream;
>
> encoding each identified attribute from the audio information stream into a time ordered index, each of the identified attributes sharing a common time reference; and
>
> **comparing results from different human language models** at approximately the same time to generate an integrated time ordered index of the identified attributes.

(Emphasis added).

Applicant respectfully disagrees with the Office Action's characterization of the prior art because the cited combination of prior art fails to teach or suggest all of the limitations of the claim. In particular, Charlesworth and Chang, either alone or in combination, do not teach or suggest comparing results from different human language models.

Charlesworth is directed to a database of annotation data related to data files. Charlesworth, Abstract. The annotation data includes phoneme and word lattice data structures. Charlesworth, col. 5, lines 2-6. In other words, the annotation data includes several phonemes and multiple words. See Charlesworth, Fig. 4b (which shows a phoneme and word lattice). The annotation data is stored in the format shown in col. 5, lines 18-38. The blocks of annotation data are arranged in blocks of equal time duration. Charlesworth, col. 5, lines 56-58. The Office Action correctly recognizes that Charlesworth does not teach comparing results from different human language models. Office Action, 3/15/2006, p. 4.

Chang is directed to speech recognition systems for detecting and tracking pitch. Chang, Abstract. An audio analyzer includes an audio analysis engine to implement audio analysis such as speech recognition. Chang, col. 5, lines 4-12. The audio analysis engine includes a syllable recognition module to analyze received audio content to detect phonemes. Chang, col. 5, lines 17-20. The syllable recognition module compares the

detected phonemes against a language model in an attempt to detect the content of the audio input. Chang, col. 5, lines 20-22. However, Chang does not teach comparing the phonemes against a language model in order to find a correct language model. This characterization, presented by the Office Action, is inaccurate because Chang never discusses finding a "correct" language model. Rather, Chang merely teaches using the phonemes and a language model to perform speech recognition.

Moreover, even if Chang were to teach comparing the phonemes against a language model in order to find a correct language model, as purported by the Office Action, Chang nonetheless fails to teach comparing results from different human language models. In fact, Chang never teaches or suggests the possibility of using different language models. Consequently, given that Chang is silent as to different language models, Chang does not teach comparing results from different human language models.

In contrast, claim 1 recites "comparing results from different human language models." For the reasons stated above, Charlesworth and Chang, either alone or in combination, fail to teach or suggest all of the limitations of the claim. In particular, the cited references do not teach or suggest comparing results from different human language models.

Additionally, even if arguendo the combination of cited references were to disclose all of the limitations of the claim, the Office Action does not provide a proper motivation to combine the references. The Office Action merely restates what Chang already teaches, namely using phonemes to perform speech recognition. Chang, col. 5, lines 17-22. Although the Office Action asserts that combining Charlesworth and Chang would increase the ability to detect speech content, the Office Action does not explain how the proposed combination might provide increased performance. In other words, the Office Action fails to explain how using the annotation database of Charlesworth in combination with the pitch tracking system of Chang would improve the performance of the pitch tracking system already disclosed by Chang. Therefore, the Office Action fails to provide a proper motivation to combine the references.

Given that the cited references fail to teach or suggest all of the limitations of the claim, Applicant respectfully submits that claim 1 is patentable over the cited references.

Moreover, the claim is patentable over the cited references because there is the Office Action fails to establish a motivation to combine the references. Accordingly, Applicant requests that the rejection of claim 1 under 35 U.S.C. § 103(a) be withdrawn.

Each of independent claims 5, 21, and 25 includes a similar limitation to the limitation of claim 1. Given that the cited references fail to disclose at least the described limitations, and the Office Action fails to establish a motivation to combine the references, Applicant respectfully submits that independent claims 5, 21, and 25 are each patentable over the cited references. Furthermore, each of independent claims 5, 21, and 25 may be patentable over the cited references for additional reasons. Accordingly, Applicant requests that the rejections of claims 5, 21, and 25 under 35 U.S.C. § 103(a) be withdrawn.

Given that claims 2-4 depend from independent claim 1, which is patentable over the cited references, Applicant respectfully submits that dependent claims 2-4 are also patentable over the cited references. Accordingly, Applicant requests that the rejection of claims 2-3 under 35 U.S.C. § 103(a) and the objection of claim 4 be withdrawn.

Given that claims 6-20 depend from independent claim 5, which is patentable over the cited references, Applicant respectfully submits that dependent claims 6-20 are also patentable over the cited references. Accordingly, Applicant requests that the rejection of claims 6-18 and 20 under 35 U.S.C. § 103(a) and the objection of claim 19 be withdrawn.

Given that claim 22 depends from independent claim 21, which is patentable over the cited references, Applicant respectfully submits that dependent claim 22 is also patentable over the cited references. Accordingly, Applicant requests that the rejection of claim 22 under 35 U.S.C. § 103(a) be withdrawn.

Given that claims 26-31 depend from independent claim 25, which is patentable over the cited references, Applicant respectfully submits that dependent claims 26-31 are also patentable over the cited references. Accordingly, Applicant requests that the rejection of claims 26-28 under 35 U.S.C. § 103(a) and the objection of claims 29-31 be withdrawn.

CLAIMS 23-24

Claim 23 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Charlesworth in view of Chang. Applicant respectfully submits that claim 23 is patentable over the combination of cited references because the combination does not teach or suggest all of the limitations of the claim. Claim 23 recites:

> A machine-readable storage medium that stores instructions, which when executed by a machine, cause the machine to perform operations comprising:
>
> converting spoken words in an information stream to written text, the information stream containing audio information; and
>
> **generating a separate encoded file for every word**, wherein each encoded file shares a common time reference.

(Emphasis added).

Applicant respectfully disagrees with the Office Action's characterization of the prior art because the cited combination of prior art fails to teach or suggest all of the limitations of the claim. In particular, Charlesworth and Chang, either alone or in combination, do not teach or suggest generating a separate encoded file for every word.

In other words, the annotation data includes several phonemes and multiple words. Charlesworth, col. 5, lines 2-6; Fig. 4b. The annotation data is stored in the format shown in col. 5, lines 18-38. The blocks of annotation data are arranged in blocks of equal time duration. Charlesworth, col. 5, lines 56-58. Given that the annotation data is arranged in blocks of time and includes several words within each block, Charlesworth fails to teach or suggest generating a separate encoded file for every word.

Chang does not cure this lack of disclosure by Charlesworth. In fact, the Office Action does not assert that Chang discloses this limitation. In any case, Chang merely describes parsing the received content into frames. Chang, col. 5, lines 33-35. An exemplary frame size is 10 milliseconds. Chang, col. 6, lines 2-5. Moreover, Chang fails to present any correlation between the frame size and a word detected from the received content. Therefore, Chang does not teach or suggest generating a separate encoded file for every word.

In contrast, claim 23 recites "generating a separate encoded file for every word." For the reasons stated above, Charlesworth and Chang, either alone or in combination, fail to teach or suggest all of the limitations of the claim. In particular, the cited references do not teach or suggest generating a separate encoded file for every word. Given that the cited references fail to teach or suggest all of the limitations of the claim,

Applicant respectfully submits that claim 23 is patentable over the cited references. Accordingly, Applicant requests that the rejection of claim 23 under 35 U.S.C. § 103(a) be withdrawn.

Given that claim 24 depends from independent claim 23, which is patentable over the cited references, Applicant respectfully submits that dependent claim 24 is also patentable over the cited references. Accordingly, Applicant requests that the objection of claim 24 be withdrawn.

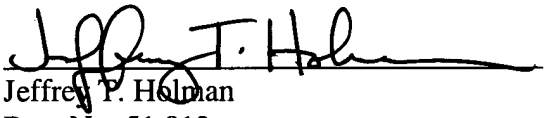
CONCLUSION

It is respectfully submitted that in view of the amendments and remarks set forth herein, the rejections and objections have been overcome. If the Examiner believes a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact Jeffrey Holman at (408) 720-8300.

If there are any additional charges, please charge them to Deposit Account No. 02-2666.

Respectfully submitted,
BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: 5/15/06



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